

AMENDMENTS TO THE DRAWINGS

Please amend the drawings as shown on the enclosed replacement sheets. In particular, descriptive legends are added to the blocks in Figs. 1 and 3-5. The descriptive legends are supported by the specification and claims as originally filed.

REMARKS

Claims 1-10 were pending in the application. By this amendment, claims 1, and 3-10 are amended. In particular, claims 1, 4-8, and 10 are amended to conform the claims with U.S. practice by removing the reference numerals in the claims. Claim 3 is amended to overcome the 35 U.S.C. § 112 rejection and claim 9 is amended to overcome the 35 U.S.C. § 101 rejection. Support for the amendments to claims 1, and 3-10 may be found in the specification and claims as originally filed. No new matter is added. Thus, claims 1-10 remain pending and at issue.

Objection to the Specification

The applicant respectfully traverses the objection to the specification. By this amendment, the specification is amended to explicitly refer to Fig. 5. Thus, the objection is moot and the applicant respectfully requests withdrawal of the objection to the specification.

Objection to the Drawings

The applicant respectfully traverses the objection to the drawings. By this amendment, the drawings are amended to include descriptive legends in the boxes shown in Figs. 1 and 3-5. Support for the descriptive legends may be found in the specification and claims as originally filed. Thus, the applicant respectfully requests withdrawal of the objection to the drawings.

35 U.S.C. § 112 Rejection

The applicant respectfully traverses the rejection of claim 3 as indefinite. By this amendment, claim 3 is amended to recite “another” subsequent request thus distinguishing the subsequent request in claim 3 from the subsequent request in claim 1. As a result, claim 3 is no longer indefinite. The applicant respectfully requests withdrawal of the rejection of claim 3.

35 U.S.C. § 101 Rejection

The applicant respectfully traverses the rejection of claim 9 as directed to non-statutory subject matter. Amended claim 9 recites a processor and a display unit. Thus, claim 9 produces the concrete and tangible result of displaying the map information data on

the display unit. As a result, claim 9 claims statutory subject matter. The applicant respectfully request withdrawal of the rejection of claim 9.

35 U.S.C. § 103 Rejections

The applicant respectfully traverses the rejection of claims 1-9 as obvious over U.S. Patent No. 6,337,693, to Roy et al. ("Roy") in view of U.S. Patent No. 5, 968,109 to Israni et al. ("Israni"), and the rejection of claim 10 as obvious over Roy in view of Israni and further in view of U.S. Patent No. 6, 282,489 to Bellesfield et al. ("Bellesfield").

Prior art fails to teach all claim limitations

To establish a *prima facie* case of obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." M.P.E.P. § 2143. The applicant respectfully submits that the Patent Office failed to establish a *prima facie* case of obviousness. The cited art fails to disclose or suggest a multi-resolution map information database having map information data where higher resolution map information data is generated by disaggregating a lower resolution level of map information data combined with additional data.

In particular, while official action alleges that it was known in the art to generate lower resolution map information from higher resolution map information by aggregating segments (*see* the official action, page 4, apparently relying on Israni to show this feature), the official action simply concludes that the opposite (generating a higher level of resolution from a lower level of resolution via disaggregation) would also have been obvious to one skilled in the art. The applicant respectfully disagrees. Roy does not teach aggregation or disaggregation, nor was Roy cited for such a reason.

On the other hand, Israni teaches aggregating segments to produce lower resolutions, (*see* Israni, co. 30, lines 14-19); however, Israni does not teach the reverse (i.e., disaggregating segments to produce higher resolutions). Thus, Israni does not teach disaggregation of any sort. The Patent Office has thus failed to establish a *prima facie* case of obviousness because neither Roy nor Israni teaches or suggests disaggregation of map data to produce higher resolution, and therefore alone or in combination they cannot teach or suggest each and every limitation of the claims. For this reason alone, the rejection of claims 1-10 is improper and should be withdrawn.

No motivation to modify Roy as alleged in the official action

One of ordinary skill in the art would not modify Roy by aggregating or disaggregating map information data. In particular, Roy teaches organizing map data into multiple layers, each layer including a grouping of objects. All of these map layers are stored as CGM (Computer Graphics Metafile) files. *See* Roy, column 6, row 34. As is known in the art, the CGM format does not support multi-resolution data, meaning that changing resolutions requires transferring complete objects.

On the other hand, the multi-resolution database of the instant application allows formation of higher resolution data by combining additional data (differences data) with lower resolution data. The differences data is a much smaller amount of data as compared to the layer data (including whole objects) taught by Roy. The advantage of combining differences data with lower resolution data is that processing and communication times are reduced. For this additional reason, the applicant respectfully requests withdrawal of the rejection of claims 1-10.

Conclusion

For the foregoing reasons, reconsideration and allowance of claims 1-10 is respectfully requested. No fees are believed due. However, the Director is hereby authorized to charge any deficiency in the fees filed, asserted to be filed or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account No. 13-2855, under Order No. 30845/40238. A duplicate copy of this paper is enclosed.

Should the examiner wish to discuss the foregoing, or any mater of form, in an effort to advance this application towards allowance, the examiner is urged to telephone the undersigned at the indicated number

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Respectfully submitted,

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